

WT 15-180

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Subject: public notice DA 15-865 Wireless Telecommunications Comments NJHPO

Federal Communications Commission
 Office of the Secretary

The New Jersey Historic Preservation Office (NJHPO) would like to provide the following comments to the public notice DA 15-865 Wireless Telecommunications Bureau seeks comment on revising the historic preservation review process for small facility deployments.

The NJHPO supports streamlining Section 106 review with all federal agencies through the adoption of Programmatic Agreements. However, we feel strongly that communities affected by the Programmatic Agreement (PA) should be heavily involved in its development.

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The programmatic discusses three alternatives.

1. Small deployments not on Historic Properties or in or near historic districts

This is similar to the existing PA in that there is no new identification of historic properties. There is a small chance a previously unknown historic property would be adversely affected by the installation of a DAS controlled by volume limitations. Since this does not drastically differ from the current PA with the FCC the NJHPO has no objection.

2. Minimally visible small deployment on historic properties and in or near historic districts

Project consultants and the NJHPO/local Historic Preservation Commissions often disagree about the effect of antenna collocation placement on historic buildings. For this to work, the restrictions on visibility of collocations from a public street or space would need to be defined in great detail. In our experience carriers wait to be told to design a more sensitive installation than taking it upon themselves to do so. In our experience, carriers seek to collocate where there are already installations. We are concerned that a sequence of minimally visible small deployments, perhaps in a range of different installation types by different carriers, will lead to a highly visible cumulative adverse effect. There would need to be a clear limit on the number of small deployments in a given location.

3. Additional Deployments on Historic Properties or in or near Historic Districts

This option would be limited to installation of small cell technology on utility poles, street lights, traffic lights. To avoid adverse effects, the installations need to be in character with the existing utility poles/street lights/traffic lights. For example, if the existing fixtures are black historic designs, the new equipment should be small and in a color that matches the fixture, and mounted in a location that does not detract from decorative elements of the fixtures. We are concerned that the number of deployments on a fixture or in a given area could lead to adverse cumulative effects. There would need to be a limit on the number of small deployments on a given fixture. We would suggest that number be one.

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We would recommend that standard installations are developed by municipally so that there is a standard design that respects the local context. We suggest consultation with locals where appropriate in developing standards.

Thank you.

Michelle Hughes

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